



Equality impact assessment form

Directorate	Corporate Resources
Service area	Digital Services
Proposal	Implementation of web chat solution
Reason for proposal	To provide a 24x7 web chat, allowing residents to receive answers to questions they ask, and providing a further channel through which our online information can be accessed to improve our web accessibility.
Sign off (Director/Head of Service)	Lee Haynes – Head of Information, Transformation & Business Applications
Date of assessment	24/11/2022

Please read the support notes to help you in Appendix 1 before completing your assessment

The form

You need to attach the completed form to any report to help councillors and colleagues make their decisions by taking equality implications into account.

The assessment team or name of individual completing this form

Team leader’s name and job title – Sam Boot (Team Leader – Digital and Web) – with digital service and web accessibility expertise and is the technical lead for digital service and web accessibility.

Other team members if appropriate

Name	Job title	Organisation	Area of expertise
Lee Haynes		DCC	

Step 1- setting the scene

Make sure you have clear aims and objectives on what you are impact assessing – this way you keep to the purpose of the assessment and are less likely to get side- tracked.

1. What are the main aims, objectives and purpose of the decision you want to make?	<ul style="list-style-type: none"> To implement an online chat functionality, providing users with 24x7 access to answers to their questions To deliver online services through multiple channels to ensure everyone is able to use such services in a way that works for them
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	<ul style="list-style-type: none"> • To improve access to, and accessibility of, all information provided on council owned websites • To make Digital Services so good that people prefer to use them, while not excluding those who can't • To make access to all Council services fully online, self service and automated to meet the expectations of the 21st century citizen, business, and visitor to Derby • To assist people to use our digital services • To make digital access the default channel for accessing services and communicating with the Council, by ensuring our digital channels work for everyone
<p>2. Why do you need to make this decision?</p>	<p>To further our aim to deliver digital services that are so easy to use that people prefer to use them, while not excluding those that do not (Assisted Digital)</p>
<p>3. Who delivers/will deliver the changed service/policy including any consultation on it and any outside organisations who deliver under procurement arrangements?</p>	<ul style="list-style-type: none"> • Digital by Default team • Customer Management • Council Partner organisations and individuals • Application system owners where the system has a public facing portal and has been identified as being able to integrate with the web chat solution
<p>4. Who are the main customers, users, partners, colleagues or groups affected by this decision?</p>	<ul style="list-style-type: none"> • Users and customers: anybody who has access to Derby City Council's digital channels. Citizens, businesses, employees (both internal and external) councillors, partners. • Anyone who provides services for the digital channels, (code, design and content): temporary and permanent employees, partners, contractors, third party providers.

Step 2 – collecting information and assessing impact

5. Who have you consulted and engaged with so far about this change, and what did they tell you? Who else do you plan to consult with? – tell us here how you did this consultation and how you made it accessible for the equality groups, such as accessible locations, interpreters and translations, accessible documents.

Assisted Digital is the term now being used to describe a range of developments, strategies, and actions aimed at ensuring that no one is left behind. The implementation of a web chat solution is an important aspect of assisted digital as it provides an additional channel through which residents can utilise our digital services, without having to directly navigate our website / related systems.

The supplier has carried out external testing with a set of real-world users whereby they anonymously collected 3500 interactions with the assistant in order to ensure it was appropriately responding to all queries and successfully assisting the wide range of users. The outcomes from this exercise are implemented in the logic of our assistant.

Once DCC have access to the web chat interface we will carry out our own quality assurance process, followed by both internal and external testing to ensure the solution is working well for everyone. We'll involve our Employee Networks and Equality Hubs with the testing.

The solution has been audited by an accredited third party to confirm compliance with the Web Content Accessibility Guidelines 2.1 to level AA.

The solution provides automatic translation for non-English interactions.

The solution is already live with a number of local authorities (Cheshire West and Chester, Telford & Wrekin, Southampton City Council) and is in use by the Information Commissioners Office (ICO) on their website.

Numerous online meetings and demos have been held with key stakeholders and those who will be responsible for implementation of the solution. Results of all sessions have been positive, with key stakeholders happy to progress.

6. Using the skills and knowledge in your assessment team or what you know yourself, and from any consultation you have done, what do you already know about the equality impact of the proposed change on particular groups? Also, use any other information you know about such as any customer feedback, surveys, national research or data. Indicate by a tick for each protected characteristic group whether this is a negative or a positive impact. Only fill in the mitigation box if you think the decision will have a negative impact and then you'll need to explain how you are going to lessen the impact.

People with protected characteristics	What do you already know?	Positive impact	Negative impact	Mitigation - what actions will you take to lessen impact?
Age – older and younger people	<p>Technical ability and access to technology:</p> <p>By providing the information from our website via additional channels, we are helping ensure as many people as possible can easily access this information.</p>	Yes		
Disability – the effects on the whole range of disabled people, including Deaf people, hearing impaired people, visually impaired people, people with mental health issues, people with learning difficulties, people living with autism and people with physical impairments	<p>Some disabled people with certain physical impairments can face barriers to accessing digital services.</p> <p>By providing our information through additional channels., including a WCAG compliant web chat, and possibly also a WhatsApp number, we are furthering the ability for disabled users to choose the most suitable way to interact with Derby City Council.</p> <p>Users may have lower learning levels.</p> <p>The web chat solution has built in spelling and grammar checks, paired with Natural Language Processing, to assist with serving answers to questions, even when those questions contain spelling and grammar errors.</p> <p>Users may have cognitive learning impairments – for example, dyslexia, autism.</p> <p>By utilising Natural Language Processing, the solution can understand questions even when asked in non-standard ways. The solution can also detect if a suitable answer is not provided, or if a user becomes frustrated, and can escalate this where necessary. This helps ensure the solution will work for everyone, regardless of any such cognitive impairments.</p>	Yes		

People with protected characteristics	What do you already know?	Positive impact	Negative impact	Mitigation - what actions will you take to lessen impact?
Gender identity - trans and those people who don't identify with a particular gender, for example, non-binary, genderfluid, genderqueer, polygender and those who are questioning their gender or non-gendered identity.	Not applicable to this project – gender identity has no impact upon the solution, or the service it provided.			We will just make sure the system doesn't assume a customer's title without asking them.
Marriage and Civil Partnership	Not applicable to this project – Marriage and Civil Partnership has no impact upon the solution, or the service it provided.			
Pregnancy and maternity - women who are pregnant or who have recently had a baby, including breast feeding mothers	Not applicable to this project – Pregnancy and maternity has no impact upon the solution, or the service it provided.			
Race - the effects on minority ethnic communities, including newer communities, Gypsies and Travellers and the Roma community	12.95% of Derby residents do not have English as a first language according to the 2021 census. The web chat includes automatic translation, allowing residents who do not have English as a first language to ask questions, and receive answers, in their preferred language.	Yes		
Religion or belief or none - the effects on religious and cultural communities, customers and colleagues	Not applicable to this project – Religion or belief has no impact upon the solution, or the service it provided.			
Sex - the effects on both men and women and boys and girls	Not applicable to this project – Sex has no impact upon the solution, or the service it provided.			
Sexual orientation - the effects on lesbians, gay men, bisexuals, pansexual, asexual and those questioning their sexuality	Not applicable to this project – Sexual orientation has no impact upon the solution, or the service it provided.			

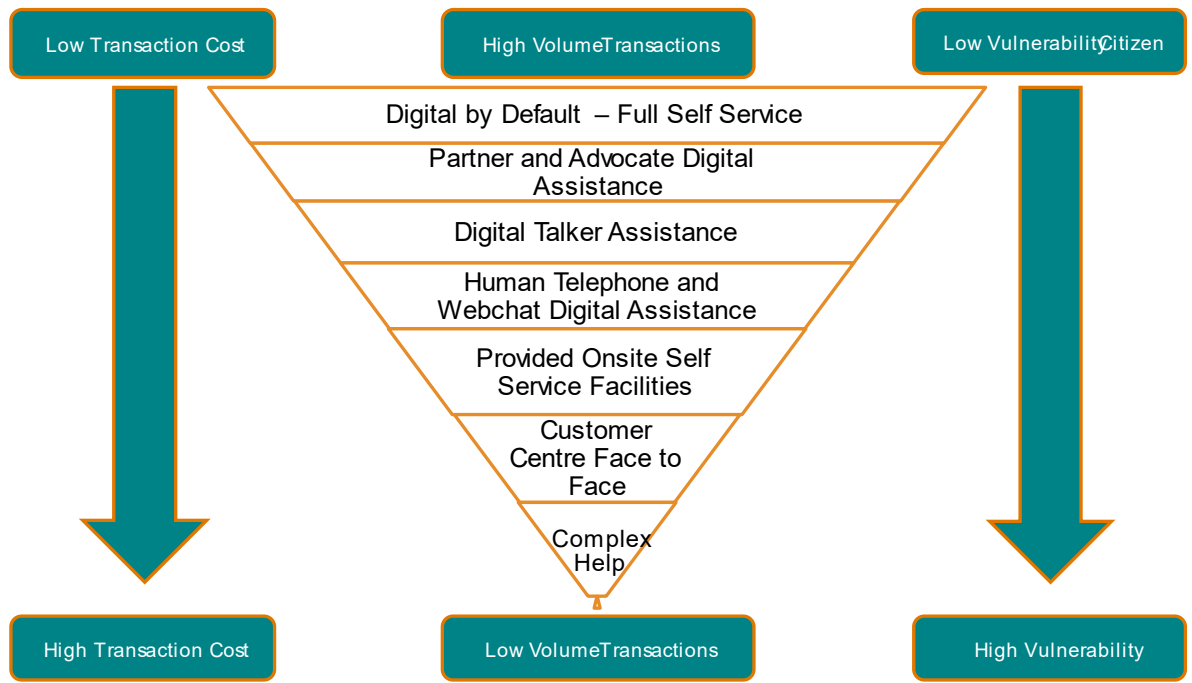
Important - For any of the equality groups you don't have any information about, then please contact our Lead on Equality and Diversity for help. You can also get lots of information on reports completed from organisations' websites such as the Equality and Human Rights Commission, Stonewall, Press for Change, Joseph Rowntree Trust and so on. Please don't put down that the impact affects 'everyone the same' – it never does!

We envision no negative impact on any of the equality groups. This solution provides an additional channel for residents to receive information from Derby City Council, making it easier for everyone, and especially those with accessibility requirements who may prefer alternative ways of contacting us.

An “Assisted Digital” provision will always be provided via Derby Direct (telephone), Front of House (Face to Face), Advocate access (personal or council partner organisation), provision of equipment, or focussed / tailored support for individual complex needs. The web chat solution will be set up in such a way that if it cannot assist a user it will assist them in finding the help they need, in line with the Preventing Exclusion principle of Assisted Digital, as follows:

Preventing Exclusion by "Assisted Digital"

Leveraging self-service, but supporting those who can't



Step 3 – deciding on the outcome

7 What outcome does this assessment suggest you take? – You might find more than one applies. Please also tell us why you have come to this decision?

Outcome 1	Yes	No major change needed – the EIA hasn’t identified any potential for discrimination or negative impact and all opportunities to advance equality have been taken
Outcome 2	No	Adjust the proposal to remove barriers identified by the EIA or better advance equality. Are you satisfied that the proposed adjustments will remove the barriers you identified?
Outcome 3	No	Continue the proposal despite potential for negative impact or missed opportunities to advance equality identified. You will need to make sure the EIA clearly sets out the justifications for continuing with it. You need to consider whether there are:

		<ul style="list-style-type: none"> • sufficient plans to stop or minimise the negative impact • mitigating actions for any remaining negative impacts • plans to monitor the actual impact.
Outcome 4	No	Stop and rethink the proposal when the EIA shows actual or potential unlawful discrimination

8. Why did you come to this decision?

The overall aim of this solution is to improve accessibility of our digital services and information, and to provide additional ways to interact with these services. The solution will provide everyone with alternative modes of contact with Derby City Council, helping ensure everyone can interact with us in a way that suits them.

Appendix 1

Equality impact assessment form– please read this section first before you do the assessment

This is our equality impact assessment form to help you equality check what you are doing when you are about to produce a new policy, review an older one, write a strategy or plan or review your services and functions. In fact, you need to do an equality impact assessment whenever a decision is needed about our services and functions that affects people and **before** that decision is made. This also includes quick Covid 19 related decisions.

We use the term ‘policy’ as shorthand on this form for the full range of policies, practices, plans, reviews, activities and procedures.

Policies will usually fall into three main categories...

- Organisational policies and functions, such as recruitment, complaints procedures, re-structures.
- Key decisions such as allocating funding to voluntary organisations, budget setting.
- Policies that set criteria or guidelines for others to use, such as criteria about school admissions, procurement methods, disabled facilities grants, on street parking bays.

So why do we need to do equality impact assessments? Although the law does not require us to do them now, the courts still place significant weight on the existence of some form of documentary evidence of compliance with the **Public Sector Equality Duty** when determining judicial review cases. This method helps us to make our decisions fairly, taking into account any equality implications, so yes we still need to complete them.

The Public Sector Equality Duty is part of the Equality Act 2010 and this Duty requires us as a public body to have '**due regard**' to eliminating discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Act. It requires us to advance equality of opportunity and foster good relations between people who share a '**relevant protected characteristic**' and people who don't. The nine protected characteristics are age, disability, gender identity, marriage and civil partnership, pregnancy and maternity, race religion and belief, sex and sexual orientation.

Having 'due regard' means:

- removing or minimising disadvantages suffered by people due to their protected characteristics
- taking steps to meet the needs of people with certain protected characteristics where these are different from the needs of other people
- encouraging people with certain protected characteristics to participate in public life or in other activities where the participation is disproportionately low.

This completed form should be attached to any Corporate Leadership, Senior Leadership, Cabinet or Personnel Committee report to help decision makers take the equality implications into account when they make the decision. Equality impact assessments **must be done before** decisions are made.

You'll find that completing these assessments will help you to:

- understand your customers' and communities needs
- develop service improvements
- improve service satisfaction
- demonstrate that you have been fair and open and considered equality when working on re-structuring
- make sure you pay due regard to the requirements of the Public Sector Equality Duty.

Unless this is a quick Covid 19 decision, don't do the form by yourself. Get a small team together and make sure you include key people in the team such as representatives from our Equality Hubs and Forums and employee networks and you could invite trade union representatives too – the more knowledge around the table the better. You also need to decide how and who you will consult with to help inform the equality impact assessment. Our Lead on Equality and Diversity can help with useful contacts – we have a team of people who are used to doing these assessments and can help with information on barriers facing particular groups and remedies to overcome these barriers.

You'll need to pull together all the information you can about how what you are assessing affects different groups of people and then examine this information to check whether some people will be negatively or positively affected. Then you'll need to look at ways of lessening any negative effects or making the service more accessible – this is where your assessment team is very useful and you can also use the wider community. Against every negative impact you will need to complete the mitigation section to explain how you will lessen the impact.

Agree an equality action plan with your assessment team, setting targets for dealing with any negative effects or gaps in information you may have found. Set up a way of monitoring these actions to make sure they are done and include them in your service business plans.

Remember, we need to complete these assessments as part of our everyday business, so we get our equality responsibilities right and stay within the law – Equality Act 2010. If in doubt – it's better and safer to do an Equality Impact Assessment than not to bother! You never know when we may get a legal challenge and someone applies for Judicial Review.

When you have completed the assessment, get it signed by your Head of Service or Service Director and **send it to our Lead on Equality and Diversity for checking and to publish on our website.** It is a public document so must not contain any jargon and must be easy to understand.

Contact for help

Ann Webster – Lead on Equality and Diversity

ann.webster@derby.gov.uk

Tel 01332 643722 mobile 07812301144

[Sign Language Service](#)

We can give you this information in any other way, style or language that will help you access it. Please contact us on **01332 643722, 07812301144** or **[derby.gov.uk/signing-service/](https://www.derby.gov.uk/signing-service/)**

Punjabi

ਇਹ ਜਾਣਕਾਰੀ ਅਸੀਂ ਤੁਹਾਨੂੰ ਕਿਸੇ ਵੀ ਹੋਰ ਤਰੀਕੇ ਨਾਲ, ਕਿਸੇ ਵੀ ਹੋਰ ਰੂਪ ਜਾਂ ਬੋਲੀ ਵਿੱਚ ਦੇ ਸਕਦੇ ਹਾਂ, ਜਿਹੜੀ ਇਸ ਤੱਕ ਪਹੁੰਚ ਕਰਨ ਵਿੱਚ ਤੁਹਾਡੀ ਸਹਾਇਤਾ ਕਰ ਸਕਦੀ ਹੋਵੇ। ਕਿਰਪਾ ਕਰਕੇ ਸਾਡੇ ਨਾਲ ਇੱਥੇ ਸੰਪਰਕ ਕਰੋ: **01332 643722** ਜਾਂ **[derby.gov.uk/signing-service/](https://www.derby.gov.uk/signing-service/)**

Polish

Aby ułatwić Państwu dostęp do tych informacji, możemy je Państwu przekazać w innym formacie, stylu lub języku. Prosimy o kontakt: **01332 64XXXX** lub **[derby.gov.uk/signing-service/](https://www.derby.gov.uk/signing-service/)**

Slovak

Túto informáciu vám môžeme poskytnúť iným spôsobom, štýlom alebo v inom jazyku, ktorý vám pomôže k jej sprístupneniu. Prosím, kontaktujte nás na tel. č.: **01332 643722** alebo na stránke **[derby.gov.uk/signing-service/](https://www.derby.gov.uk/signing-service/)**

Urdu

یہ معلومات ہم آپ کو کسی دیگر ایسے طریقے، انداز اور زبان میں مہیا کر سکتے ہیں جو اس تک رسائی میں آپ کی مدد کرے۔ براہ کرم **01332 643722** یا **[derby.gov.uk/signing-service/](https://www.derby.gov.uk/signing-service/)** پر ہم سے رابطہ کریں